

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

|                        |   |                          |
|------------------------|---|--------------------------|
| IN RE:                 | ) | CASE NO. 23-80623        |
|                        | ) |                          |
| DANNIE L. BENNETT, JR. | ) | Honorable Brian S. Kruse |
| MARIA J BENNETT,       | ) |                          |
|                        | ) | CHAPTER 13               |
| Debtors.               | ) |                          |

**MOTION FOR EXPEDITED HEARING**

COMES NOW the creditors HEA Corporation, Jordan Mellican, and Renee Mellican (collectively, the “Mellicans”) and pursuant to Local Rule 9006-1, request an expedited hearing on the Motion for Relief from Automatic Stay filed on October 9, 2024 (Doc. No. 204) (the “Motion”).

In support of the Motion, the Mellicans respectfully show the Court as follows:

1. That they filed the Motion on October 9, 2024
2. The Motion requested relief including relief from the stay to file the October 1, 2024 judgment granted to the Mellicans in the Douglas County District Court.
3. Thereafter, the Court set the matter for hearing on November 4, 2024, at 11:00 a.m.
4. In the interim, the Mellicans have received notice that certain property of the bankruptcy estate, a residential house located at 8613 Citta Circle, Bellevue, Nebraska 68147 (the “Property”), is for sale and are informed that the sale on the Property is scheduled to close on October 25, 2024.
5. The Mellicans further show the Court that no motion has been filed to authorize the sale of the Property, but that it appears the sale is scheduled to close nonetheless.

WHEREFORE, the Mellicans respectfully requests an entry of an order granting them an expedited hearing on their Motion for Relief from Stay at a time prior to the scheduled closing of the Property on October 25, 2024 or otherwise, and for such relief as the Court deems necessary to prevent the sale of the Property without notice and authorization by this Court, and for such other and further relief as the Court deems just and equitable. .

DATED this 17<sup>th</sup> day of October 2024.

HEA CORPORATION, JORDAN MELLICAN, and  
RENEE MELLICAN, Plaintiffs

By: /s/Douglas E. Quinn  
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*Attorneys for Plaintiffs*

### CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which sent notification of such filing to the following:

Joel G. Lonowski  
*Attorney for Debtors*

Erin McCartney  
*Chapter 13 Trustee*

Jerry L. Jenson  
*U.S. Trustee*

I hereby further certify that on October 17, 2024, a copy of the above and foregoing Motion for Expedited Hearing was served upon the following by regular United States mail, postage pre-paid;

Dannie L. Bennett, Jr.  
Maria J. Bennett  
13411 Lochmoor Circle  
Bellevue, NE 68123  
*Debtors*

Jeff Nelson  
Judy Zimmer  
Coldwell Banker NHS Real Estate  
1079 N. 205<sup>th</sup> Street  
Elkhorn, NE 68022  
*Listing Agents*

/s/Douglas E. Quinn